

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

WILUS INSTITUTE OF STANDARDS AND  
TECHNOLOGY INC.,

*Plaintiff,*

v.

HP INC., et al.,

*Defendants.*

Civil Action No. 2:25-cv-00069-JRG-RSP

**LEAD CASE**

**JURY DEMANDED**

WILUS INSTITUTE OF STANDARDS AND  
TECHNOLOGY, INC.,

*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD., and  
SAMSUNG ELECTRONICS AMERICA, INC.,

*Defendants.*

Civil Action No. 2:25-cv-00070-JRG-RSP

**Member Case**

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

Plaintiff and Counterclaim Defendant, Wilus Institute of Standards and Technology, Inc. (“Wilus”), Defendants HP Inc., Samsung Electronics Co. Ltd., and Samsung Electronics America, Inc. (collectively, “Defendants”), and Counterclaim Defendant Sisvel International, S.A. (collectively with Wilus and Defendants, the “Parties”) hereby jointly request that the Court enter the proposed Protective Order, attached hereto as Exhibit A.

Dated: June 18, 2025

Respectfully submitted,

/s/ Reza Mirzaie

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and Samsung Electronics America, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 18<sup>th</sup> day of June, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail on this same date.

/s/ Reza Mirzaie

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Reza Mirzaie